

FREEMAN, NOOTER & GINSBERG
ATTORNEYS AT LAW

LOUIS M. FREEMAN
THOMAS H. NOOTER*
LEE A. GINSBERG

75 MAIDEN LANE
SUITE 503
NEW YORK, N.Y. 10038

NADJIA LIMANI
OF COUNSEL

(212) 608-0808
TELECOPIER (212) 962-9696

CHARLENE RAMOS
OFFICE MANAGER

April 7, 2021

Hon. P. Kevin Castel
U.S. District Judge
U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: U.S. v. Terry Former
19 CR 781 (PKC)

*On the conditions outlined by the government, the applicant is APPROVED
SO ORDERED
USDS
4-12-21*

Dear Judge Castel:

We write to request modification of conditions of release to permit Mr. Former to travel from his home in Texas to Montgomery, Alabama to visit his wife's sister for her baby shower from April 23 to April 26, 2021; and to travel from his home in Texas to visit his mother in Destin, Florida for her birthday and mother's day from May 7-May 10, 2021.

We have spoken to AUSA Emily Deininger to seek her consent. She has no objection on condition that (1) pre-trial agrees; (2) he reports immediately prior to and after the trips; and (3) he provides pretrial with an itinerary. Mr. Former's pretrial officer in Texas Matthew Simons does not object to this request.

Respectfully submitted,

/S/ Louis M. Freeman
Louis M. Freeman